

United States District Court

Western DISTRICT OF Texas

FILED

JAN 17 2008

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY [Signature]
DEPUTY CLERK

UNITED STATES OF AMERICA

V.

Saulo REYES
Karina TARANGO

CRIMINAL COMPLAINT

CASE NUMBER: 08-277-M

I, the undersigned complainant, being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about January 16, 2008, in El Paso County, in the Western District of Texas defendant(s) did, knowingly and intentionally possess with the intent to distribute, greater than 50 kilograms of marijuana, to wit: approximately 985.16 pounds (gross weight) of marijuana, a Schedule I Controlled Substance; and conspired to possess with the intent to distribute the aforementioned mentioned Controlled Substance in violation of Title 21 United States Code, Section(s) 841 and 846.

I further state that I am a U.S. Immigration and Customs Enforcement Special Agent and that this complaint is based on the following facts:

See Attached Affidavit

Continued on the attached and made a part hereof: X Yes No

[Signature]
Signature of Complainant

Jesus A. Lazcano, Special Agent

Sworn to before me and subscribed in my presence,

January 17, 2008

Date

Richard P. Mesa, U.S. Magistrate Judge

Name & Title of Judicial Officer

at El Paso, Texas

City and State

[Signature]

Signature of Judicial Officer

In November 2007, an ICE Special Agent, acting in an undercover capacity, was introduced to Saulo REYES-Gamboa. REYES-Gamboa was attempting to locate an individual to assist him with a drug smuggling venture. REYES-Gamboa and the undercover Agent initiated negotiations for the smuggling of an unknown quantity of drugs into the United States from the Republic of Mexico through the El Paso District ports of entry.

Negotiations for this smuggling venture continued throughout December 2007, and into January 2008. Recordings of the meetings and any telephone calls between the undercover Agent and REYES-Gamboa discussing the drug smuggling operation were recorded.

On January 15, 2008, REYES-Gamboa provided a partial payment of \$4,250 dollars to the undercover Agent for the smuggling operation. The undercover Agent and REYES-Gamboa agreed to the entry of a vehicle containing an unknown quantity of marijuana on January 16, 2008.

On January 16, 2008, the ICE SAC El Paso arranged for the safe entry of approximately 985 pounds of marijuana into the United States from the Republic of Mexico through the Paso Del Norte Port of Entry; El Paso, Texas. Upon entry ICE Special Agents and Investigators from the El Paso County Sheriff's Department established surveillance of the vehicle which was subsequently followed to a residence located at 1288 Sunbridge; Horizon City, Texas. Agents and Investigators observed the vehicle being parked in the garage of the residence.

A short time later, two individuals later identified as Karina and Cesar TARANGO, were observed leaving the residence in another vehicle. Surveillance of the residence was maintained with the vehicle used for the smuggling operation parked in the street in front of the residence.

After the delivery of the vehicle to the Sunbridge residence, the undercover Agent contact REYES-Gamboa for the purpose of payment for the smuggling operation and to discuss an additional smuggling venture on January 17, 2008. On January 16, 2008, at approximately 7:55 PM, the undercover Agent met with REYES-Gamboa and received a payment of \$15,000 dollars for the prior smuggling operation. This meeting was recorded. Negotiations continued for future smuggling operations through the El Paso ports of entry. At the conclusion of this meeting REYES-Gamboa was arrested. REYES-Gamboa requested to speak to an attorney.

At approximately 8:15 PM, Special Agents and Investigators approached the Sunbridge residence, and obtained consent to search from Fernando VASQUEZ; Karina TARANGO's husband. Search of the residence resulted in the seizure of approximately 985 pounds of marijuana in the garage of the residence. Karina TARANGO was arrested, and admitted she agreed to store the marijuana in her residence for two days. TARANGO admitted she would receive payment for storing the marijuana at a later date.